

EXHIBIT 7

FILED UNDER SEAL

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO
TRUCKING LLC,

Defendants.

Case No.

3:17-cv-00939-WHA

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY
VIDEOTAPED DEPOSITION OF PIERRE-YVES DROZ
San Francisco, California
Friday, March 31, 2017
Volume I

Reported by: SUZANNE F. GUDELJ

CSR No. 5111

Job No. 2581643

PAGES 1 - 187

1 8.5 degrees. That's basically those red lines on
2 the drawings.

3 Q If you look at the spec sheet, the
4 Exhibit 1019 --

5 A Mm-hmm. 09:53:39

6 Q -- it says it uses 64 LiDAR channels. Do
7 you see that?

8 A I see that.

9 Q And that's the HDL-64. Does 64 refer to
10 the number of LiDAR channels? 09:53:50

11 A That's what I think.

12 Q And 64 LiDAR channels corresponds to 64
13 diode lasers?

14 MR. JAFFE: Objection. Form.

15 THE WITNESS: I mean, 64 channels, there's 09:54:03
16 different ways to implement that, and there's
17 different ways to implement 64 channel LiDARs.

18 BY MR. JACOBS:

19 Q How did Velodyne implement 64 LiDAR
20 channels? 09:54:17

21 MR. JAFFE: Objection. Form.

22 THE WITNESS: Can you like refer to a
23 specific device? Because, I mean, I don't know
24 about everything that Velodyne makes.

25 BY MR. JACOBS: 09:54:25

1

[REDACTED]

2

BY MR. JACOBS:

3

Q

[REDACTED]

4

[REDACTED]

5

[REDACTED]

01:17:51

6

A

[REDACTED]

7

[REDACTED]

8

[REDACTED]

9

[REDACTED]

10

[REDACTED] [REDACTED]

01:18:05

11

[REDACTED] [REDACTED]

12

(Reporter clarification.)

13

[REDACTED] [REDACTED]

14

[REDACTED]

15

[REDACTED]

01:18:18

16

Q

[REDACTED]

17

[REDACTED]

18

A

[REDACTED]

19

[REDACTED]

20

[REDACTED]

01:18:36

21

[REDACTED]

22

[REDACTED]

23

Q

[REDACTED]

24

A

[REDACTED]

25

Q

[REDACTED]

01:18:50

1

[REDACTED]

2

A

[REDACTED]

3

[REDACTED]

4

[REDACTED]

5

[REDACTED]

01:19:00

6

[REDACTED]

7

[REDACTED]

8

Q

[REDACTED]

9

[REDACTED]

10

A

[REDACTED]

01:19:10

11

[REDACTED]

12

Q

[REDACTED]

13

A

[REDACTED]

14

[REDACTED]

15

[REDACTED]

01:19:20

16

[REDACTED]

17

[REDACTED]

18

[REDACTED]

19

(Reporter clarification.)

20

[REDACTED]

01:19:32

21

[REDACTED]

22

[REDACTED]

23

[REDACTED]

24

[REDACTED]

25

[REDACTED]

01:19:47

1

[REDACTED]

2

Q

[REDACTED]

3

[REDACTED]

4

[REDACTED]

5

[REDACTED]

01:20:01

6

[REDACTED]

7

MR. JAFFE: Objection. Form.

8

THE WITNESS: [REDACTED]

9

[REDACTED]

10

[REDACTED]

01:20:14

11

[REDACTED]

12

[REDACTED]

13

[REDACTED]

14

BY MR. JACOBS:

15

Q

[REDACTED]

16

A

[REDACTED]

17

MR. JAFFE: Just slow down.

18

THE WITNESS: [REDACTED]

19

[REDACTED]

20

[REDACTED]

01:20:33

21

[REDACTED]

22

[REDACTED]

23

[REDACTED]

24

[REDACTED]

25

[REDACTED]

01:20:52

1

2

BY MR. JACOBS:

3

Q

4

5

01:21:01

6

7

A

8

9

10

01:21:16

11

12

Q

13

14

15

01:21:34

16

A Yes.

17

Q Let me ask you a couple of questions about

18

510 Systems.

19

What is your understanding of the

20

following: 510 Systems gets acquired by Google and

01:21:58

21

one or more people at 510 Systems retain some rights

22

with respect to previously developed technology.

23

Do you have an understanding of that topic?

24

MR. JAFFE: I'm not sure if that's a

25

question, but I'm going to object as to form.

01:22:18

1 Again, just 'cause of the territory we're in, I'm
2 going to caution you not to reveal the content of
3 any attorney-client privileged information.

4 THE WITNESS: So I've seen -- like what
5 I've seen from the -- from this board, it had a lot 02:35:18
6 of elements, you know, very like similar to our
7 boards. The -- I understand that -- that Anthony
8 like downloaded those files, and so the -- with
9 those elements on it. As to knowing exactly how
10 like one PCB or not became the other, I'm not -- you 02:35:41
11 know, that would be speculation. I don't know
12 like...

13 BY MR. JACOBS:

14 Q Are you aware of any other evidence that
15 the 14,000 allegedly downloaded files were used at 02:35:55
16 Uber?

17 MR. JAFFE: Object to form. Again, same
18 caution about privileged information.

19 THE WITNESS: I mean -- also mean -- you
20 know, I don't have direct information that would, 02:36:20
21 like that would say that. The -- the rest -- you
22 know, these are speculation that's (inaudible).

23 That's -- like some information that I've
24 seen, you know, could -- maybe I could speculate
25 that -- that -- like, you know, what we -- I just 02:36:39

1 Q I asked you about how -- what information
2 they give you -- sorry, what information you have
3 that suggests that the files may have been used in
4 the creation of that circuit board.

5 A Mm-hmm. 02:38:24

6 Q Set that aside.

7 A Yes.

8 Q Do you have any other information that
9 bears on the question whether Uber is using any of
10 Waymo's trade secrets? 02:38:32

11 MR. JAFFE: I'm going to object to form,
12 and then same caution again not to reveal the
13 content of any attorney-client communications.

14 THE WITNESS: Not that I can think of.

15 BY MR. JACOBS: 02:38:43

16 Q On the -- we talked earlier about the dome
17 that -- that covers the LiDAR when the LiDAR is
18 deployed on a field vehicle -- on a vehicle in the
19 field.

20 A Mm-hmm. 02:38:54

21 Q Can that dome be seen through under any
22 circumstances?

23 A That dome is actually transparent in the
24 infrared bands.

25 (Reporter clarification.)